

August 22, 2022

Pro Se 5 (Rev. 12/16) Complaint for a Civil Case Alleging Negligence

CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

## UNITED STATES DISTRICT COURT

BY: lad  
DEPUTY

for the

District of \_\_\_\_\_

Division \_\_\_\_\_

Case No. 6:22-cv-00880-ADA-JCM

(to be filled in by the Clerk's Office)

Gabryelle Daniels / D [REDACTED] D [REDACTED]  
Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Jury Trial: (check one) ☐ Yes ☐ NoU.S. Army Ft. Hood / Rustin D. Durkin  
Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

## COMPLAINT FOR A CIVIL CASE ALLEGING NEGLIGENCE

(28 U.S.C. § 1332; Diversity of Citizenship)

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Street Address

City and County

State and Zip Code

Telephone Number

E-mail Address

Gabryelle D Daniels / D [REDACTED] D [REDACTED]  
Box 2nd Street  
Copperas Cove, Coryell  
Texas 76522  
254-548-5632  
DanielsGabryelle85@gmail.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

**Defendant No. 1**

Name  
Job or Title *(if known)*  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address *(if known)*

Rushad Parkinson  
unknown  
Incarcerated  
unknown  
unknown  
unknown

**Defendant No. 2**

Name  
Job or Title *(if known)*  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address *(if known)*

Ft. Hood Army Base  
  
Ft. Hood, Bell  
Texas 76544  
254-287-1110  
unknown

**Defendant No. 3**

Name  
Job or Title *(if known)*  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address *(if known)*

**Defendant No. 4**

Name  
Job or Title *(if known)*  
Street Address  
City and County  
State and Zip Code  
Telephone Number  
E-mail Address *(if known)*

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Under 28 U.S.C. § 1332, federal courts may hear cases in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000. In that kind of case, called a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff. Explain how these jurisdictional requirements have been met.

**A. The Plaintiff(s)**

1. If the plaintiff is an individual

The plaintiff, (name) Gabyelle Daniels / D [REDACTED], is a citizen of the State of (name) Texas.

2. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

**B. The Defendant(s)**

1. If the defendant is an individual

The defendant, (name) DUSTIN PARKINSON, is a citizen of the State of (name) Texas. Or is a citizen of (foreign nation) \_\_\_\_\_.

2. If the defendant is a corporation

The defendant, (name) U.S. Army Ft. Hood Base, is incorporated under the laws of the State of (name) Texas, and has its principal place of business in the State of (name) Texas. Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) U.S. Government.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

**C. The Amount in Controversy**

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

**III. Statement of Claim**

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

On (date) Oct 24/2021, at (place) Multiple places,  
the defendant(s): (1) performed acts that a person of ordinary prudence in the same or similar circumstances would not have done; or (2) failed to perform acts that a person of ordinary prudence would have done under the same or similar circumstances because (describe the acts or failures to act and why they were negligent)

Rashad Parkinson knowingly had multiple  
sexual misconduct with the then minor  
D [REDACTED] D [REDACTED] 13 years old. whom was  
in U.S. Army Ft. Hood Texas

The acts or omissions caused or contributed to the cause of the plaintiff's injuries by (explain)

Sexual misconduct of A minor  
① [REDACTED] ② [REDACTED]

**IV. Relief**

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

100,000 from U.S. Government in order to  
relocate, find other resources to get D [REDACTED]  
back where she needs to be as far as  
counseling. Defendant is currently  
incarcerated.





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Gabryelle N. Daniels  
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Copperas Cove TX 76522

**TO:** U. S. District Court  
800 Franklin Ave  
Suite 304  
Waco TX 76701

Label 228, March 2016

FOR DOMESTIC AND INTERNATIONAL U

EP14F July 2022  
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